



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
ONE CONGRESS STREET SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

July 5, 2005

Lonnie Monaco (monacolj@efane.northdiv.navy.mil)
Engineering Field Activity Northeast, Naval Facilities Engineering Command
Code 1821/LM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Response to EPA Comments on the Monitoring Event #24 Report for Sites 1,3 & the Eastern Plume Long Term Monitoring, April 2004, dated June 6, 2005, Naval Air Station Brunswick, Maine

Dear Mr. Monaco:

Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are below.

In general, the Responses concur with EPA follow-up Comments. The following additional remark points out a newly discovered error in the MNA assessment. The Comment number is that used in the follow-up Comments and Responses.

General Comments

3. The revised table (Table 17) has corrected the error noted previously in the scoring for the presence of methane. The corrections to the scoring for methane are carried through properly. In addition, Figure 14 is revised according to the re-computed scoring.

Further review of the scoring, however, reveals another error in the execution of the EPA protocol. In particular, the scoring for dissolved oxygen concentrations implemented in Table 17 awards 3 points for DO < 0.5 mg/L and -3 points for DO > 0.5 mg/L. However, the protocol calls for 3 points for DO < 0.5 mg/L, and -3 points for DO > 5.0 mg/L. The rationale is that the anaerobic bacteria necessary for reductive dechlorination do not tolerate well-oxygenated environments. For intermediate DO levels, 0.5 mg/L < DO < 5.0 mg/L, the intent is to award 0 points, as this range is neither favorable nor necessarily "fatal" to anaerobic activity. Application of these criteria affects the scoring for wells MW-1104, MW-230A, MW-319, MW-333, MW-NASB-212, -330, P-111, MW-303, MW-331, MW-337, and MW-339. All of these wells exhibit DO in the intermediate range, and should be awarded 0 scores for DO. These changes move a number of wells from the "inadequate evidence" category (<6) to the "limited evidence" category (6-14), including MW-230A, MW-330, P-111, MW-303, MW-337, and MW-339. No wells move into the "adequate evidence" category (>14). These changes will result in a

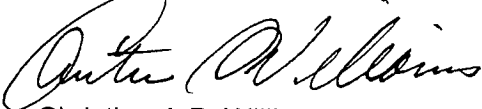
somewhat more regular pattern overall on the map, with the blue "inadequate" embayment around MW-337 and MW-230A shrinking significantly, and the "patch" around MW-330 and P-111 being eliminated.

Please note, too, that P-111 should be awarded 1 point for ORP < 50 mV.

Please update the table and figure accordingly.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,



Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc. Ed Benedikt/Brunswick Conservation Commission e-mail only (rbenedik@gwi.net)
Tom Fusco/BACSE e-mail only (tfusco@gwi.net)
Carolyn LePage/LePage Environmental (clepagegeo@aol.com)
Peter Golonka Gannet-Fleming e-mail only (pgolonka@gfnet.com)
Pete Nimmer/EA Environmental e-mail only (pln@eaest.com)
Claudia Sait/ME DEP (claudia.b.sait@state.me.us)
Lisa Joy/NASB (lisa.joy@navy.mil)
Darren Gainer/ECC email only (dgainer@ecc.net)
Al Easterday/ECC email only (aeasterday@ecc.net)